Message

From: Garrison, Scott [Garrison.Scott@epa.gov]

Sent: 12/17/2019 4:27:53 PM

To: Goodis, Michael [Goodis.Michael@epa.gov]

CC: Rosenblatt, Daniel [Rosenblatt.Dan@epa.gov]; Davis, Donna [Davis.Donna@epa.gov]; Davis, Kable

[Davis.Kable@epa.gov]; Paisley-Jones, Claire [Paisley-Jones.Claire@epa.gov]; Chiu, Enid [Chiu.Enid@epa.gov]

Subject: RE: Administrator Memo - Pending Dicamba 24c & NY 24c Attachments: Administrator Memo 24(c) Dec 2019 (clean).sbg.docx

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My comments are attached. Bob and Joe are currently reviewing this and they'll let you know if they have anything more or different.

Scott Garrison
Pesticides and Toxic Substances Law Office (2333A)
Office of General Counsel
U.S. Environmental Protection Agency
202-564-4047
garrison.scott@epa.gov

From: Goodis, Michael < Goodis. Michael@epa.gov>

Sent: Monday, December 16, 2019 5:10 PM **To:** Garrison, Scott < Garrison. Scott@epa.gov>

Cc: Rosenblatt, Daniel <Rosenblatt.Dan@epa.gov>; Davis, Donna <Davis.Donna@epa.gov>; Davis, Kable

<Davis.Kable@epa.gov>; Paisley-Jones, Claire <Paisley-Jones.Claire@epa.gov>; Chiu, Enid <Chiu.Enid@epa.gov>

Subject: Administrator Memo - Pending Dicamba 24c & NY 24c

Scott

Attached for your review/comment is a draft memo to the Administrator regarding disapproval of 24c registrations that are more restrictive than the sect 3.

Included are both a marked-up and clean version of the document. In addition to your overall review, we ask for you input on whether or not a state can amend an existing 24c and are they subject to disapproval within the 90-day window.

Also, some states include provisions in their 24c for training requirements, for example – would these be considered more restrictive and subject to disapproval?

We received direction that they would like this memo to be provided to the Administrator by COB Wednesday. I expect the OCSPP IO will have comments too, so your review as practicable is appreciated.

Michael L. Goodis, P.E. Director, Registration Division (RD) Office of Pesticide Programs (OPP)

Phone 703-308-8157 Room \$7623